

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NEW YORK**

CONSUMER FINANCIAL PROTECTION  
BUREAU, et al.,

Plaintiffs,

v.

STRATFS, LLC (f/k/a STRATEGIC FINANCIAL  
SOLUTIONS, LLC), et al.

Defendants, and

STRATEGIC ESOP, et al.,

Relief Defendants.

**CASE NO. 1:24cv00040**

**NOTICE OF WITHDRAWAL OF  
COUNSEL FOR PLAINTIFF**

I, Joseph Michael Sanders, pursuant to Local Rule 83.2(c)(3), provide notice to this Court of the following:

1. Shirley T. Chiu, Kristin L. Bateman and Nicole Cabañez have served as counsel in the above-captioned matter for the plaintiff, Consumer Financial Protection Bureau (Bureau).
2. Shirley T. Chiu has been reassigned to another unit within the Bureau, and as she will no longer be representing the Bureau in this case as of the date of this filing, should be removed from the docket as counsel of record.
3. Kristin L. Bateman is leaving the Bureau, and as she will no longer be representing the Bureau in this case as of the date of this filing, should be removed from the docket as counsel of record.

4. Nicole Cabañez has left the Bureau, and as she will no longer be representing the Bureau in this case as of the date of this filing, should be removed from the docket as counsel of record.
5. I, Joseph Michael Sanders, along with Vanessa Anne Buchko and Akash R. Desai, will remain lead counsel for the plaintiff.

Dated: March 4, 2025

Respectfully submitted,

Consumer Financial Protection Bureau

MARC PAOLETTA  
Chief Legal Officer

DANIEL SHAPIRO  
Deputy Chief Legal Officer

CARA PETERSEN  
Principal Deputy Enforcement Director

RICHA S. DASGUPTA  
Deputy Enforcement Director

TIMOTHY M. BELSAN  
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/s/ Joseph Michael Sanders

Joseph Michael Sanders

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